

**REQUIRED STATEMENT TO ACCOMPANY**  
**ALL MOTIONS TO MODIFY STAY**

All Cases: Debtor(s) Tharon Bradley

Case No. 18-16173

Chapter 13

All Cases: Moving Creditor U.S. Bank National Association, as  
Trustee for HarborView Mortgage Loan Trust 2006-4, Mortgage  
Loan Pass-Through Certificates, Series 2006-4

Date Case Filed June 6, 2018

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed August 28, 2018

1. Collateral
  - a. Home 4600 Blarney Dr, Matteson, IL 60443
  - b. Car Year, Make and Model \_\_\_\_\_
  - c. Other (describe) \_\_\_\_\_
2. Balance owed as of September 3, 2021 \$516,421.62  
Total of all other liens including collateral \$ 0.00
3. In chapter 13 cases, attach a payment history listing the amount and dates of all payments received from the debtor(s) post-petition:
4. Estimated Value of Collateral (must be supplied in all cases) \$318,350.00
5. Default
  - a. Pre-Petition Default  
Number of months \_\_\_\_ Amount \$ \_\_\_\_\_
  - b. Post-Petition Default
    - i. On direct payments to the moving creditor  
Number of months 14 Amount \$37,025.05 plus attorney fees and costs incurred in connection with this motion
    - ii. On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a. Lack of Adequate Protection § 362 (d) (1)
    - i. No Insurance \_\_\_\_\_
    - ii. Taxes Unpaid \_\_\_\_\_ Amount \$ \_\_\_\_\_
    - iii. Rapidly depreciating asset \_\_\_\_\_
    - iv. Other (describe) \_\_\_\_\_
  - b. No Equity and not Necessary for an Effective Reorganization § 362 (d) (2) \_\_\_\_\_
  - c. Other "Cause" § 362 (d) (1) \_\_\_\_\_
    - i. Bad Faith (describe) \_\_\_\_\_
    - ii. Multiple filings \_\_\_\_\_
    - iii. Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the collateral
    - i. ☐ Reaffirm
    - ii. ☐ Redeem
    - iii. ☐ Surrender
    - iv. ☐ No Statement of Intention Filed

Date: September 14, 2021

/s/ Michael N. Burke  
Counsel for Movant